

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

APR 22 2008

JAMES N. HATTEN/Clerk
By: *Edwards* Deputy Clerk

UNITED STATES OF AMERICA

v.

FRANCISCO SANTILLAN ARELLANO
a/k/a Eduardo Chavez
a/k/a "El Padrino"
a/k/a "Paco"

GABRIEL GARCIA SANCHEZ
a/k/a "El Pinguí"

LUIS AGUILAR ROMERO
a/k/a Carlos Reyes
Garcia
a/k/a Carlos Perez
Garcia
a/k/a "El Guicho"

JOSE LUIS PLATA SILVA
a/k/a "El Tangitas"

JOSE RODRIGUEZ RODRIGUEZ
a/k/a "El Viejo"

FRANCISCO HERNANDEZ LOPEZ
a/k/a "El Dormido"

GIOVANNY TREJO GOMEZ
a/k/a Giovanni Quintero
Trejo
a/k/a "El Calzon"

CESAR VAZQUEZ VENTURA
a/k/a "El Cejon"

CRIMINAL INDICTMENT

NO.

1: 08-CR-0152

THE GRAND JURY CHARGES THAT:

COUNT ONE

CONSPIRACY

1. Beginning as early as July 3, 2007, and continuing through on or about March 27, 2008, in the Northern District of Georgia and elsewhere, the defendants, FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco;" GABRIEL GARCIA SANCHEZ, a/k/a "El Pinqui;" LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho;" JOSE LUIS PLATA SILVA, a/k/a "El Tangitas;" JOSE RODRIGUEZ RODRIGUEZ, a/k/a "El Viejo;" FRANCISCO HERNANDEZ LOPEZ, a/k/a "El Dormido;" GIOVANNY TREJO GOMEZ, a/k/a Giovanni Quintero Gomez, a/k/a "El Calzon;" and CESAR VAZQUEZ VENTURA, a/k/a "El Cejon," did combine, conspire, confederate, agree and have a tacit understanding with each other, and others known and unknown to the Grand Jury, to commit the following offenses:

A. To knowingly possess identification documents and authentication features that are and appear to be identification documents and authentication features of the United States which were stolen and produced without lawful authority, knowing that such documents and features were stolen and produced without such authority, in violation of Title 18, United States Code, Section 1028(a)(6) and (b)(1)(A);

B. To knowingly and without lawful authority produce identification documents, authentication features, and false

identification documents, in violation of Title 18, United States Code, Sections 1028(a)(1) and (b)(1)(A); and

C. To sell a Social Security card that purported to be a card issued by the Commissioner of Social Security, to counterfeit a Social Security card, and to possess a counterfeit Social Security card with intent to sell it, all for the purpose of obtaining anything of value from any person, in violation of Title 42, United States Code, Section 408(a)(7)(C).

D. To knowingly forge, counterfeit, alter and falsely make alien registration receipt cards, knowing them to be forged, counterfeited altered and falsely made, or to have been otherwise procured by fraud or unlawfully obtained, in violation of Title 18, United States Code, Section 1546; and

E. To encourage and induce aliens to reside in the United States, knowing and in reckless disregard of the fact that such residence in the United States is and will be in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

Background

2. It is relevant to the conspiracy that:

A. In order to obtain a Social Security Number (SSN) for employment purposes one must either be a United States citizen or, if an alien, classified as an individual who can work in this country. Generally, foreign born individuals who have tourist

visas or who are not legally in this country are not entitled to SSNs.

B. SSNs are assigned to a single person, and, once used, are not reassigned to anyone else.

C. Upon entering the United States, an individual must establish his or her identity and admissibility through documents presented to an Immigration Inspector. An alien entering the United States must have a visa, a Resident Alien card or Permanent Resident card that indicates that he or she is a lawful permanent resident, a permit, a border crossing card, or some other document prescribed by statute or regulation for entry into the United States. Persons may enter the United States under a number of different visa classifications. Some visa classifications, such as B1, B2 and F1, do not allow an individual to remain in the United States indefinitely or to work while they are in the United States.

D. In December 1997, Resident Alien cards were renamed Permanent Resident cards. Prior to approximately November 2004, Resident Alien cards were issued by the Department of Justice. Since approximately November 2004, Permanent Resident cards have been and are issued by the Department of Homeland Security (DHS), Citizenship and Immigration Services (CIS). Both Resident Alien cards and Permanent Resident cards contain the holder's name, photograph, date of birth, alien registration number, and an expiration date. An alien registration number is assigned to a

single person, and once used, is not assigned to anyone else. Resident Alien cards and Permanent Resident cards are used by non-citizens as proof of legal entry into and residence in the United States, and also demonstrate that the (legal) holder is lawfully eligible for employment.

E. In order to obtain a Resident Alien card or a Permanent Resident card, an individual must apply to CIS on a Form I-485.

Manner and Means

3. It was part of the conspiracy that:

A. The defendants, FRANCISCO SANTILLAN ARELLANO, GABRIEL GARCIA SANCHEZ, LUIS AGUILAR ROMERO, JOSE LUIS PLATA SILVA, JOSE RODRIGUEZ RODRIGUEZ, FRANCISCO HERNANDEZ LOPEZ, GIOVANNY TREJO GOMEZ, and CESAR VAZQUEZ VENTURA conspired to and did manufacture numerous fraudulent identification documents, including but not limited to Social Security cards, Permanent Resident cards, Resident Alien cards, and various State driver's licenses or State identification documents.

B. The defendants, FRANCISCO SANTILLAN ARELLANO, GABRIEL GARCIA SANCHEZ, LUIS AGUILAR ROMERO, JOSE LUIS PLATA SILVA, JOSE RODRIGUEZ RODRIGUEZ, FRANCISCO HERNANDEZ LOPEZ, GIOVANNY TREJO GOMEZ, and CESAR VAZQUEZ VENTURA conspired to and did manufacture said fraudulent identification documents at several locations, specifically including apartments in the Atlanta, Georgia area.

C. Defendants possessed and used computers, laminators, card

stock, and other equipment and supplies to produce the fraudulent identification documents.

Overt Acts

4. In furtherance of the conspiracy, and in order to effect the purposes and objects thereof, the defendants, FRANCISCO SANTILLAN ARELLANO, GABRIEL GARCIA SANCHEZ, LUIS AGUILAR ROMERO, JOSE LUIS PLATA SILVA, JOSE RODRIGUEZ RODRIGUEZ, FRANCISCO HERNANDEZ LOPEZ, GIOVANNY TREJO GOMEZ, CESAR VAZQUEZ VENTURA and others known and unknown to the grand jury, committed overt acts in the Northern District of Georgia and elsewhere, including but not limited to the following:

A. The Grand Jury incorporates by reference as overt acts Counts Two through Twenty-Five of this Indictment.

Overt Acts B-1 through B-43: Fraudulent Social Security Cards

B. From on or about July 3, 2007, and continuing through on or about March 27, 2008, the defendants FRANCISCO SANTILLAN ARELLANO, GABRIEL GARCIA SANCHEZ, LUIS AGUILAR ROMERO, JOSE LUIS PLATA SILVA, JOSE RODRIGUEZ RODRIGUEZ, FRANCISCO HERNANDEZ LOPEZ, GIOVANNY TREJO GOMEZ, and CESAR VAZQUEZ VENTURA, aided and abetted by each other and others known and unknown to the grand jury, manufactured and possessed Social Security cards bearing the names and SSNs set forth below, which SSNs had been assigned by the Commissioner of the Social Security Administration to the individuals identified by their initials below, and who were the

true holders of the SSNs:

OVERT ACT	NAME ON CARD	SSN ON CARD	TRUE HOLDER
B-1	FREDY CARBAJAL	XXX-XX-1641	D.D.
B-2	FRANCISCO RODRIGUEZ	XXX-XX-7321	L.H.
B-3	JAVIER VILLAGRAN	XXX-XX-7236	A.V. Jr.
B-4	MODESTO CARBAJAL	XXX-XX-6160	E.R.
B-5	ROSARIO RODRIGUEZ	XXX-XX-2800	T.B.
B-6	MARCOS ROJAS	XXX-XX-7670	E.G.
B-7	APOLINAR RODRIGUEZ	XXX-XX-2806	V.H.
B-8	MARIA IDALIA	XXX-XX-6669	M.R.
B-9	SAUL RAMOS	XXX-XX-5454	J.W.
B-10	BERTIDA LOPEZ	XXX-XX-8879	J.M.
B-11	J MARIO BUENROSTRO M	XXX-XX-9072	A.B.
B-12	HERAN CIFUENTES VAZQUEZ	XXX-XX-7605	C.D.
B-13	MARIA RAMIREZ RAMIREZ	XXX-XX-2132	M.B.
B-14	DOREEN D. AVERY	XXX-XX-9008	A.A.
B-15	JOSE LUIS APONTE NAVA	XXX-XX-5326	J.C.
B-16	FRANCISCO JAVIER GARCIA RAYON	XXX-XX-6732	D.B.
B-17	OLIVER MAYO MARTINEZ	XXX-XX-7854	C.C.

OVERT ACT	NAME ON CARD	SSN ON CARD	TRUE HOLDER
B-18	BELISARIO PENALOZA RODRIGU	XXX-XX-8974	M.B.
B-19	GERMAN PEREZ GOMEZ	XXX-XX-8976	A.R.
B-20	JUAN ALBERTO GONZALEZ	XXX-XX-5674	D.T.
B-21	RUBY CAVAZOS	XXX-XX-5411	C.R.
B-22	MATOMA SAMAGASSI	XXX-XX-5411	K.G.
B-23	CARGAS BUYESENCI LOZA	XXX-XX-9087	C.V.
B-24	SANTO ANTONIO JUAREZ	XXX-XX-3243	R.M.
B-25	JOSE DE JESUS MEDINA	XXX-XX-8276	B.R.
B-26	JOSE RAMON VIEYRA	XXX-XX-0536	J.H.
B-27	LETYCIA GARCIA	XXX-XX-0923	S.R.
B-28	HECTOR MANUEL DURAN	XXX-XX-8714	P.C.
B-29	FRANCISCO SANTOS TOLENTINO	XXX-XX-7854	N.P.B.
B-30	ANA GABRIEL HERNANDEZ	XXX-XX-2884	M.Y.
B-31	LEONEL VEGA CORONA	XXX-XX-9812	J.S.
B-32	VALENTIN DIAZ LEYVA	XXX-XX-9413	A.A.
B-33	CONCEPCION MEZA	XXX-XX-3156	B.T.
B-34	DIANA DORANTES BAILON	XXX-XX-7652	B.W.

OVERT ACT	NAME ON CARD	SSN ON CARD	TRUE HOLDER
B-35	ABIGAIL MARTINEZ HERNANDEZ	XXX-XX-0934	J.T.
B-36	HERMELINDO JUAREZ OLIVARES	XXX-XX-8474	K.H.
B-37	CRISTIAN LOPEZ FERNANDEZ	XXX-XX-0798	J.K.
B-38	BLANCA GUTIERREZ	XXX-XX-8090	J.S.
B-39	ALEX SANCHEZ	XXX-XX-7865	C.S.
B-40	MANUEL CHAVEZ	XXX-XX-7634	D.S.
B-41	JOSE SALINAS	XXX-XX-7853	R.B.
B-42	FELIX ORDONEZ HERNANDEZ	XXX-XX-7640	L.S.O.
B-43	DONALD O RECINOS MARTINEZ	XXX-XX-7654	J.H.

Overt Acts C-1 through C-30: Fraudulent Permanent Resident Cards

C. From on or about July 3, 2007, and continuing through on or about March 27, 2008, the defendants FRANCISCO SANTILLAN ARELLANO, GABRIEL GARCIA SANCHEZ, LUIS AGUILAR ROMERO, JOSE LUIS PLATA SILVA, JOSE RODRIGUEZ RODRIGUEZ, FRANCISCO HERNANDEZ LOPEZ, GIOVANNY TREJO GOMEZ, and CESAR VAZQUEZ VENTURA, aided and abetted by each other and others known and unknown to the grand jury, manufactured and possessed Resident Alien cards and/or Permanent Resident cards bearing the names and alien registration numbers set forth below, which alien registration numbers had been assigned by

DHS to the individuals identified by their initials below, and who were the true holders of the alien registration numbers:

OVERT ACT	FIRST NAME	LAST NAME	ALIEN REGISTRATION NUMBER	TRUE HOLDER
C-1	RICARDO	LOPEZ	A94 XXX 103	E.A.L.
C-2	FRANCISCO	MONDRAGON	A94 XXX 196	A.D.M.
C-3	MAURICIO	LOPEZ	A94 XXX 111	M.A.P.M.
C-4	SANDRA	SISNEROS	A94 XXX 117	J.J.R.
C-5	ALBERTO	SOSA	A94 XXX 187	J.A.A.
C-6	SONIA	TORRES	A97 XXX 655	A.J.S.
C-7	JOSE	RODRIGUEZ	A98 XXX 834	Z.W.
C-8	JUAN	ENRIQUEZ QUIROZ	A98 XXX 321	H.C.
C-9	ALEJANDRO	RAMOS ESPINALES	A98 XXX 258	G.S.R.R.
C-10	JUAN	PEDROZA	A21 XXX 245	K.J.L.
C-11	SANTOS	LOPEZ EBARISTO	A91 XXX 011	Y.A.F.
C-12	ELSA	SORIANO	A95 XXX 260	A.M.R.
C-13	LIDIA	CHAVEZ	A95 XXX 259	N.E.S.
C-14	ALEJANDRO	CORREA VEGA	A96 XXX 787	J.T.T.
C-15	NOLBERTO	CABRERA	A90 XXX 612	P.A.M.
C-16	ALEJANDRA	GUZMAN RENDON	A79 XXX 421	A.S.P.
C-17	FREDY	MARTINEZ ENRIQUEZ	A94 XXX 501	J.A.C.
C-18	IGNACIO	DE LEON	A95 XXX 102	J.A.A.
C-19	ADELITA	MORENO VILLA	A99 XXX 643	A.G.
C-20	JESUS	HERNANDEZ VEGA	A71 XXX 485	L.I.S.

OVERT ACT	FIRST NAME	LAST NAME	ALIEN REGISTRATION NUMBER	TRUE HOLDER
C-21	BERNARDO	MATA VIRELAS	A99 XXX 985	M.A.V.
C-22	HERMANN	CAMARGO	A93 XXX 121	S.S.
C-23	MARIA	QUESADA	A99 XXX 853	G.R.N.
C-24	FERNANDO	ORNELAS	A92 XXX 056	A.R.Q.
C-25	MARTHA	PACHECO SANTOS	A94 XXX 042	G.A.S.
C-26	ETIEL	GODINEZ URIBE	A98 XXX 786	R.A.G.
C-27	ELIZABETH	TORRES RODRIGUEZ	A93 XXX 187	S.M.R.
C-28	RODRIGO	VIEYRA ALVAREZ	A99 XXX 587	O.B.S.E.
C-29	CAROLINA	VASQUEZ	A91 XXX 078	T.C.O.
C-30	ISMAEL	SALES GOMEZ	A93 XXX 200	R.Z.N.

Overt Acts D-1 through D-14:
Fraudulent State Driver's Licenses and Identification Cards

D. From on or about July 3, 2007, and continuing through on or about March 27, 2008, the defendants FRANCISCO SANTILLAN ARELLANO, GABRIEL GARCIA SANCHEZ, LUIS AGUILAR ROMERO, JOSE LUIS PLATA SILVA, JOSE RODRIGUEZ RODRIGUEZ, FRANCISCO HERNANDEZ LOPEZ, GIOVANNY TREJO GOMEZ, and CESAR VAZQUEZ VENTURA, aided and abetted by each other and others known and unknown to the grand jury, manufactured and possessed State driver's licenses or identification cards purportedly issued by the States identified below, and bearing the names and numbers listed below:

OVERT ACT	STATE	FIRST NAME	LAST NAME	LICENSE OR ID NUMBER
D-1	TEXAS	MARTIN ALBERTO	TREVINO	XXXXX5487
D-2	GEORGIA	EFRAIN	CORDERO DIMAIO	ID XXXX7895
D-3	GEORGIA	ISMAEL	OSEGURA	DL XXXXX4027
D-4	GEORGIA	FREDY	HERNANDEZ	ID XXXX7120
D-5	GEORGIA	PEDRO E.	RAMIREZ TORRES	ID XXXX3587
D-6	GEORGIA	CAROLINA JANE	MORALES	ID XXXXX9756
D-7	NORTH CAROLINA	MARIBEL	LOPEZ RODRIGUEZ	XXXX2232
D-8	NORTH CAROLINA	EMMANUEL	FERNANDEZ VENTURA	XXXX9154
D-9	NORTH CAROLINA	JOSE GABRIEL	ROMERO LUNA	XXXX2723
D-10	TENNESSEE	PABLO	RODRIGUEZ	XXXXX2732
D-11	TENNESSEE	LUIS A.	CORDERO	XXXXX9621
D-12	TENNESSEE	CELSO JAVIER	CASTILLO	XXXXX1196
D-13	TENNESSEE	ROLANDO	SAENZ, Jr.	XXXX7620
D-14	TENNESSEE	EDUARD MICHAEL	ESPINOZA	XXXXX1233

July 2007 Fraudulent Document Sale

E. On or about July 3, 2007, in the parking lot of the El Progreso #7 restaurant located on Tara Boulevard in Jonesboro, Georgia (the "El Progreso"), defendant GIOVANNY TREJO GOMEZ, a/k/a "El Calzon," agreed, in exchange for \$130.00, to provide a confidential informant (CI 1) a fraudulent Permanent Resident Card

and a fraudulent Social Security Card in the name of "Blanca Gutierrez."

F. On or about July 3, 2007, at the El Progreso, defendant Defendant GIOVANNY TREJO GOMEZ accepted from CI 1 a photograph of CI 1, along with the name "Blanca Gutierrez" and a date of birth to be used on the fraudulent identification documents.

G. Approximately one and one-half hours after their initial meeting, defendant GIOVANNY TREJO GOMEZ returned to the El Progreso and delivered to CI 1 a fraudulent Permanent Resident Card, bearing Alien Registration number A92 XXX 322, the name "Blanca Gutierrez," and CI 1's photograph, and a fraudulent Social Security Card, bearing the Social Security Number XXX-XX-8090 and the name "Blanca Gutierrez," in exchange for a payment of \$130.00 from CI 1.

February 2008 Fraudulent Document Sales

H. On or about February 7, 2008, at his residence in Atlanta, Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a "El Padrino, a/k/a "Paco," agreed to provide an undercover investigator (the "UI"), whose name defendant FRANCISCO SANTILLAN ARELLANO believed to be "Pablo Hernandez," with a fraudulent driver's license, Permanent Resident card, and Social Security card.

I. On or about February 7, 2008, defendant FRANCISCO SANTILLAN ARELLANO accepted from the UI a photograph of the UI, and \$180.00 in payment for the fraudulent identification documents.

J. On or about February 8, 2008, defendant FRANCISCO

SANTILLAN ARELLANO phoned the UI and instructed the UI to meet him at the Northeast Plaza shopping center located on Buford Highway in Atlanta, Georgia ("Northeast Plaza") for delivery of the fraudulent identification documents.

K. On or about February 8, 2008, at the Northeast Plaza location, defendant FRANCISCO SANTILLAN ARELLANO gave the UI an envelope containing a fraudulent Tennessee driver's license, a fraudulent Permanent Resident card, and a fraudulent Social Security Card, all bearing the name "Pablo Rodriguez."

L. On or about February 8, 2008, defendant FRANCISCO SANTILLAN ARELLANO agreed to obtain fraudulent identification documents for five persons who purportedly worked for the UI.

M. On or about February 13, 2008, at his residence in Atlanta, Georgia, defendant FRANCISCO SANTILLAN ARELLANO accepted five photographs of Hispanic males from the UI.

N. On or about February 13, 2008, at the Northeast Plaza location, defendant FRANCISCO SANTILLAN ARELLANO delivered to the UI, in exchange for \$450.00, five fraudulent Permanent Resident cards, each bearing one of the photographs provided by the UI to defendant FRANCISCO SANTILLAN ARELLANO, and five fraudulent Social Security cards.

O. On or about February 14, 2008, defendant CESAR VAZQUEZ VENTURA, a/k/a "El Cejon," at a Texaco Station located at the intersection of Floyd Road and Fontaine Road in Mableton, Georgia,

delivered to a confidential informant ("CI 2") fraudulent Permanent Resident and Social Security cards, in exchange for \$110.00.

March Fraudulent Document Sales

P. In a phone call on or about March 5, 2008, defendant GABRIEL GARCIA SANCHEZ, a/k/a "El Pingu," referred a confidential informant ("CI 3") to defendant LUIS AGUILAR ROMERO, a/k/a "El Guicho," to assist CI 3 in the purchase of fraudulent identification documents, and provided CI 3 with a cell phone number that CI 3 could use to contact defendant LUIS AGUILAR ROMERO.

Q. On or about March 5, 2008, defendant LUIS AGUILAR ROMERO spoke to CI 3 by phone and agreed to provide CI 3 with a Permanent Resident card and a Social Security card, and instructed CI 3 to meet him at the Plaza Fiesta shopping center on Buford Highway in DeKalb County, Georgia (the "Plaza Fiesta shopping center")

R. On or about March 5, 2008, defendant LUIS AGUILAR ROMERO met CI 3 at the Plaza Fiesta shopping center and took a photograph of CI 3 for use in the manufacture of the fraudulent Permanent Resident card.

S. On or about March 5, 2008, approximately two hours after their initial meeting, defendant LUIS AGUILAR ROMERO met CI 3 again at the Plaza Fiesta shopping center, and in exchange for \$100.00, provided CI 3 with a fraudulent Permanent Resident card and a fraudulent Social Security card bearing the name "Ricardo Lopez."

T. On or about March 18, 2008, in the parking lot of a Pep Boys retail establishment on Buford Highway in DeKalb County, Georgia, defendant LUIS AGUILAR ROMERO accepted from a confidential informant (CI 4) a photograph of CI 4 and four other individuals to be used for the manufacture of fraudulent identification documents.

U. On or about March 18, 2008, a few hours after their previous meeting, defendant LUIS AGUILAR ROMERO met CI 4 at the same location on Buford Highway, and in exchange for \$400.00, provided CI 4 with five sets of fraudulent identification documents, consisting of Permanent Resident cards and Social Security cards.

V. On or about March 25, 2008, defendant JOSE LUIS PLATA SILVA, a/k/a "El Tangitas," met a confidential informant ("CI 5") at the El Progreso to arrange for the sale of fraudulent identification documents.

W. On or about March 25, 2008, defendant JOSE LUIS PLATA SILVA accepted \$40.00 as a down payment and two photographs from CI 5 for the manufacture of two sets of fraudulent identification documents, consisting of Permanent Resident cards and Social Security cards.

All in violation of Title 18, United States Code Sections 371 and 2.

COUNT TWO

IDENTIFICATION DOCUMENT FRAUD

On or about July 3, 2007, in the Northern District of Georgia, defendant GIOVANNY TREJO GOMEZ, a/k/a "El Calzon," aided and abetted by others known and unknown to the grand jury, attempted to and did knowingly transfer an identification document, authentication feature, and false identification document, namely, a Social Security card in the name of "Blanca Gutierrez," knowing that such document and feature was stolen and produced without lawful authority, all in violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A), and (f), and Title 18, United States Code, Section 2.

COUNT THREE

IDENTIFICATION DOCUMENT FRAUD

On or about February 8, 2008, in the Northern District of Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco," aided and abetted by others known and unknown to the grand jury, attempted to and did knowingly transfer an identification document, authentication feature, and false identification document, namely, a fraudulent Permanent Residence card in the name of Pablo Rodriguez, knowing that such document and feature was stolen and produced without lawful authority, all in violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A), and (f), and Title 18, United States Code, Section 2.

COUNT FOUR

SOCIAL SECURITY FRAUD

On or about February 8, 2008, in the Northern District of Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco," knowingly possessed a counterfeit Social Security card in the name of "Pablo Rodriguez" with the intent to sell it, all in violation of Title 42 U.S.C. § 408(a)(7)(C).

COUNT FIVE

IDENTIFICATION DOCUMENT FRAUD

On or about February 13, 2008, in the Northern District of Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco," aided and abetted by others known and unknown to the grand jury, attempted to and did knowingly possess with intent to use unlawfully and transfer five or more identification documents, authentication features, and false identification documents, specifically, Permanent Resident cards in the names of "Javier Quintero Solorzano," "Alex Sanchez," "Jose Rodriguez," "Juan Enriquez Quiroz," and "Alejandro Ramos Espinales," all in violation of Title 18, United States Code, Sections 1028(a)(3), (b)(1)(B), and (f), and Title 18, United States Code, Section 2.

COUNTS SIX THROUGH TEN

SOCIAL SECURITY FRAUD

On or about February 13, 2008, in the Northern District of Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco," knowingly possessed counterfeit Social Security cards in the names listed below, with intent to sell them:

COUNT	NAME ON SSN CARD
6	Javier Quintero Solorzano
7	Alex Sanchez
8	Jose Rodriguez
9	Juan Enriquez Quiroz
10	Alejandro Ramos Espinales

all in violation of Title 42 U.S.C. § 408(a)(7)(C).

COUNT ELEVEN

IDENTIFICATION DOCUMENT FRAUD

On or about February 14, 2008, in the Northern District of Georgia, defendant CESAR VAZQUEZ VENTURA, a/k/a "El Cejon," aided and abetted by others known and unknown to the grand jury, attempted to and did knowingly transfer an identification document, authentication feature, and false identification document, namely, a fraudulent Permanent Residence card in the name of "Juan Pedroza," knowing that such document and feature was stolen and produced without lawful authority, all in violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A), and (f), and

Title 18, United States Code, Section 2.

COUNT TWELVE

IDENTIFICATION DOCUMENT FRAUD

On or about March 5, 2008, in the Northern District of Georgia, defendants LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho," and GABRIEL GARCIA SANCHEZ, a/k/a "El Pinguí," aided and abetted by each other and others known and unknown to the grand jury, attempted to and did knowingly transfer an identification document, authentication feature, and false identification document, namely, a fraudulent Permanent Residence card in the name of "Ricardo Lopez," knowing that such document and feature was stolen and produced without lawful authority, all in violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A), and (f), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

SOCIAL SECURITY FRAUD

On or about, March 5, 2008, in the Northern District of Georgia, defendants LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho," and GABRIEL GARCIA SANCHEZ, a/k/a "El Pinguí," aided and abetted by each other and others known and unknown to the Grand Jury, knowingly possessed a counterfeit Social Security card in the name of "Ricardo Lopez" with the intent to sell it, all in violation of Title 42 U.S.C. § 408(a)(7)(C), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

IDENTIFICATION DOCUMENT FRAUD

On or about March 18, 2008, in the Northern District of Georgia, defendant LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho," aided and abetted by others known and unknown to the grand jury, attempted to and did knowingly possess with intent to use unlawfully and transfer five or more identification documents, authentication features, and false identification documents, specifically, Permanent Resident cards in the names of "Francisco Mondragon," "Maurizio Lopez," "Sandra Sisneros," "Alberto Sosa," and "Manuel Chavez," all in violation of Title 18, United States Code, Section 1028(a)(3), (b)(1)(B), and (f), and Title 18, United States Code, Section 2.

COUNTS FIFTEEN THROUGH NINETEEN

SOCIAL SECURITY FRAUD

On or about March 18, 2008, in the Northern District of Georgia, defendant LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho," knowingly possessed counterfeit Social Security cards in the names listed below, with intent to sell them:

COUNT	NAME ON SSN CARD
15	Francisco Mondragon
16	Maurizio Lopez
17	Sandra Sisneros
18	Alberto Sosa

COUNT	NAME ON SSN CARD
19	Manuel Chavez

all in violation of Title 42 U.S.C. § 408(a)(7)(C).

COUNTS TWENTY THROUGH TWENTY-FIVE

AGGRAVATED IDENTITY THEFT

COUNT TWENTY

On or about July 3, 2007, in the Northern District of Georgia, defendant GIOVANNY TREJO LOPEZ, a/k/a "El Calzon," aided and abetted by others known and unknown to the grand jury, knowingly possessed and used without lawful authority a means of identification of another person, specifically, Social Security number XXX-XX-8090, belonging to J.S., such possession and use being in relation to committing the felony violation of identification document fraud, as charged in this indictment in Count Two, all in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b)(2) and Title 18, United States Code, Section 2.

COUNTS TWENTY-ONE AND TWENTY-TWO

On or about the dates listed below, in the Northern District of Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco," aided and abetted by others known and unknown to the grand jury, knowingly possessed and used without lawful authority a means of identification of another person, specifically, the alien registration number and Social Security number listed below, belonging to the persons identified

by their initials below as the true number holders, such possession and use being in relation to committing the felony violations of identification document fraud or Social Security Fraud, as charged in this indictment in the Counts listed below:

COUNT	DATE	ALIEN REGISTRATION OR SOCIAL SECURITY NUMBER	TRUE NUMBER HOLDER	RELATED FELONY COUNT
21	2-8-2008	A75 XXX 321	K.D.L.-M.	Three
22	2-8-2008	XXX-XX-6576	J.D.	Four

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b)(2) and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

On or about February 14, 2008, in the Northern District of Georgia, defendant CESAR VAZQUEZ VENTURA, a/k/a "El Cejon," aided and abetted by others known and unknown to the grand jury, knowingly possessed and used without lawful authority a means of identification of another person, specifically, Alien Registration number A21 XXX 245, belonging to K.J.L., such possession and use being in relation to committing the felony violation of identification document fraud, as charged in this indictment in Count Eleven, all in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b)(2) and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

On or about March 5, 2008, in the Northern District of Georgia, defendants LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho," and GABRIEL GARCIA SANCHEZ, a/k/a "El Pingu," aided and abetted by each other and others known and unknown to the grand jury, knowingly possessed and used without lawful authority a means of identification of another person, specifically, Social Security Number XXX-XX-7153, belonging to T.A., such possession and use being in relation to committing the felony violation of Social Security fraud, as charged in this indictment in Count Thirteen, all in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b)(2) and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

On or about March 18, 2008, in the Northern District of Georgia, LUIS AGUILAR ROMERO, a/k/a Carlos Reyes Garcia, a/k/a Carlos Perez Garcia, a/k/a "El Guicho," aided and abetted by others known and unknown to the grand jury, knowingly possessed and used without lawful authority a means of identification of another person, specifically, Social Security number XXX-XX-7634, belonging to D.S., such possession and use being in relation to committing the felony violation of Social Security fraud, as charged in this indictment in Count Nineteen, all in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b)(2) and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

POSSESSION OF A FIREARM BY AN ILLEGAL ALIEN

On or about March 25, 2008, in the Northern District of Georgia, defendant FRANCISCO SANTILLAN ARELLANO, a/k/a Eduardo Chavez, a/k/a "El Padrino," a/k/a "Paco," an alien then illegally and unlawfully in the United States, knowingly possessed, in and affecting commerce, a firearm, specifically, a Jennings Caliber .22 long rifle pistol, in violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

A TRUE BILL
Grant McCluskey
FOREPERSON

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